

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, *et al.*,

*Defendants.*

Hon. Brian R. Martinotti

No. 2:23-cv-03885-BRM-LDW

**APPLICATION FOR ADMISSION  
*PRO HAC VICE* OF KATE HARRIS  
PURSUANT TO D.N.J. L. CIV.R.  
101**

Intervenor-Defendants the Metropolitan Transportation Authority (the “MTA”) and the Triborough Bridge and Tunnel Authority (“TBTA”), by their undersigned counsel, hereby move this Court for an entry of an Order allowing the admission *pro hac vice* of:

Kate Harris, Esq.  
Kaplan Hecker & Fink LLP  
1050 K Street NW, Suite 1040  
Washington, DC 20001

**PLEASE TAKE FURTHER NOTICE** that the undersigned certifies as follows:

1. I will comply with Local Civil Rule 101.1(c) and will be held responsible for the conduct of Kate Harris, Esq.
2. I will ensure that Kate Harris Esq. complies with Local Civil Rule 101.1(c).
3. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will sign all pleadings, briefs and other papers filed with the Court.
4. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will make all Court appearances required by the Court and the Local Rules.

**PLEASE TAKE FURTHER NOTICE** that the MTA and TBTA will rely upon the accompanying declaration of Kate Harris, Esq. in support of this motion and that no brief is necessary as this motion raises no issue of law and the relief sought is within the Court's discretion.

Dated: November 7, 2023

Respectfully submitted,

/s/ Daniel Chorost

Daniel Chorost  
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Metropolitan Transportation Authority and the  
Triborough Bridge and Tunnel Authority*